

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**MOTION OF THE UNITED STATES POSTAL SERVICE  
FOR LATE ACCEPTANCE OF FILING THE RESPONSE TO PRESIDING OFFICER'S  
INFORMATION REQUEST No. 2, QUESTION 12**

The United States Postal Service hereby moves for late acceptance of the filing of its response to Presiding Officer's Information Request No. 2, Question 12 (POIR2Q12). That question inquires deeply into details of a study that was not reviewed or considered during preparation of the Postal Service Request in this docket on in RAOI in any other way. Indeed, postal officials outside the United States Postal Service Office of the Inspector General (USPSOIG) were and are largely unaware of that work, except in the most general sense and via reports generated by USPSOIG. POIR2Q12 was filed at a time when postal resources dedicated to this docket were exceptionally strained, August 24, 2011. Counsel accordingly informed the PRC General Counsel both that Dr. Yezer's work did not inform RAOI, and that the resources to investigate possible responses to the inquiry were not then available. The press of business prevented the compilation and review of a response until now. Accordingly, a response could not be filed until today. The Postal Service regrets the delay, but believes that no prejudice can flow from examination of materials that in no way

informed development of the RAOI Request, the universe of such materials being infinitely large.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno, Jr.  
Chief Counsel, Global Business

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3083; Fax -3084  
khollies@usps.gov  
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